

The Examiner is respectfully directed to independent Claim 1, which recites that an embodiment of the present invention is directed to a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting from the web server class library and the virtual machine class library classes required to run the web application in the device to form the web server, wherein the Web server is specific to the web application" (emphasis added). Claims 2, 4 and 5 are dependent on Claim 1 and recite additional limitations.

The Examiner is also respectfully directed to independent Claim 6, which recites that embodiments of the present invention comprise "a web server class library and a virtual machine class library, each including classes for different web applications for forming different application-specific web servers; and .. a compiler ... to form the web service such that the web server is specific to the web application" (emphasis added). Claims 7 and 9 are dependent on Claim 6 and recite additional limitations.

The Examiner is also respectfully directed to independent Claim 10, which recites that embodiments of the present invention comprise "an application-specific web server core and an application-specific virtual machine that together execute the web application on the device, wherein the application-specific web server core and the application-specific virtual machine are compiled from a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web

applications and for forming different application-specific web servers" (emphasis added). Claims 11 and 12 are dependent on Claim 10 and recite additional limitations.

Applicant respectfully submits that Narasimhan does not show or suggest the present invention as recited by independent Claims 1, 6 and 10. Applicant acknowledges instances in which Narasimhan mentions a web server. However, Applicant finds no showing or suggestion in Narasimhan of a web server specific to a web application, as recited in Claims 1, 6 and 10.

Furthermore, Applicant finds no showing or suggestion in Narasimhan of a method for forming an application-specific web server that is compiled by selecting, from a web server class library and a virtual machine class library, the classes required to run the web application, wherein the web server class library and the virtual machine class library include classes for forming different application-specific web servers, as recited in Claim 1.

Moreover, Applicant finds no showing or suggestion in Narasimhan of a system for forming an application-specific web server using a compiler that receives a web server class library and a virtual machine class library, each including classes for different web applications and for forming different application-specific web servers, as recited in Claim 6.

In addition, Applicants find no showing or suggestion in Narasimhan of a web server structure that includes an application-specific web server core and an application-specific virtual machine

compiled from a web server class library and a virtual machine class library that include classes for forming different application-specific web servers, as recited in Claim 10.

At best, Narasimhan mentions only a standard web server (not an application-specific web server as claimed). Moreover, Narasimhan does not show or suggest forming a web server (much less an application-specific web server), nor does Narasimhan show or suggest forming different web servers, as claimed.

In the instant Office Action, the Examiner maintains that, according to Narasimhan, libraries are separated into categories such as "graphics" and "communications" and are used by a compiler to form an application-specific web server (reference is made to pages 2-3 of the instant Office Action). Applicant submits that neither the information in Narasimhan called out by the Examiner, nor Narasimhan in its entirety, shows or suggests an application-specific web server or a method of forming the same, as claimed in Claims 1, 6 and 10. In addition, Applicant submits that neither the information in Narasimhan called out by the Examiner, nor Narasimhan in its entirety, shows or suggests forming different web servers. The information called out by the Examiner describes the creation of a "virtual control panel" applet that is created using the graphics and communication libraries mentioned by the Examiner. The compiled applet is "programmed" into device memory. When the device is connected to a network and to a client device, the applet is downloaded to the client device. The applet then renders on the client device the aforementioned virtual control panel. Applicant respectfully submits that there are manifold differences between an applet

downloaded to a client device for rendering a virtual control panel and an application-specific web server.

To summarize, Applicant respectfully submits that Narasimhan does not show or suggest the present invention as recited in Claims 1, 6 and 10. Applicant also submits that Breslau does not overcome the shortcomings of Narasimhan. Applicant respectfully submits that Breslau, alone or in combination with Narasimhan, does not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting from the web server class library and the virtual machine class library classes required to run the web application in the device to form the web server, wherein the Web server is specific to the web application" as recited in independent Claim 1. In addition, Applicant respectfully submits that Breslau, alone or in combination with Narasimhan, does not show or suggest "a web server class library and a virtual machine class library, each including classes for different web applications for forming different application-specific web servers; and .. a compiler ... to form the web service such that the web server is specific to the web application" as recited in independent Claim 6. Furthermore, Applicant respectfully submits that Breslau, alone or in combination with Narasimhan, does not show or suggest "an application-specific web server core and an application-specific virtual machine that together execute the web application on the device, wherein the application-specific web server core and the application-specific virtual machine are compiled from a web server class library and a virtual machine class library, wherein the web server class library and the

virtual machine class library include classes for different web applications and for forming different application-specific web servers" as recited in independent Claim 10.

In summary, Applicant respectfully asserts that the features of the present invention recited in independent Claims 1, 6 and 10 are not shown or rendered obvious by Narasimhan and Breslau (alone or in combination). Applicant respectfully submits that the Examiner's basis for rejection of Claims 1, 6 and 10 under 35 U.S.C. § 103(a) is traversed, and that these claims are in condition for allowance. As such, Applicant respectfully submits that the Examiner's basis for rejection of Claims 2, 4, 5, 7, 9, 11 and 12 under 35 U.S.C. § 103(a) is also traversed, as these claims are dependent on allowable base claims and contain additional limitations that are patentably distinguishable over the combination of Narasimhan and Breslau.

Claim 3 and 8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Narasimhan in view of Breslau and further in view of Madany et al. ("Madany;" US 6,199,196). The Applicant has reviewed the cited references and respectfully submits that the present invention as recited in Claims 3 and 8 is not anticipated nor rendered obvious by Narasimhan, Breslau and Madany, alone or in combination.

Claim 3 is dependent on independent Claim 1, and Claim 8 is dependent on independent Claim 6. As discussed above, Applicant respectfully contends that Narasimhan and Breslau, alone or in combination, do not show or suggest the present invention as recited in Claims 1 and 6.

Madany does not overcome the shortcomings of Narasimhan and Breslau. Applicant respectfully submits that Madany, alone or in combination with Narasimhan and Breslau, does not show or suggest a method comprising "providing a web server class library and a virtual machine class library, wherein the web server class library and the virtual machine class library include classes for different web applications and for forming different application-specific web servers; ... and ... compiling the web server by selecting from the web server class library and the virtual machine class library classes required to run the web application in the device to form the web server, wherein the Web server is specific to the web application" as recited in independent Claim 1. In addition, Applicant respectfully submits that Madany, alone or in combination with Narasimhan and Breslau, does not show or suggest "a web server class library and a virtual machine class library, each including classes for different web applications for forming different application-specific web servers; and .. a compiler ... to form the web service such that the web server is specific to the web application" as recited in independent Claim 6.

In summary, Applicant respectfully asserts that the features of the present invention recited in independent Claims 1 and 6 are not shown or rendered obvious by Narasimhan, Breslau and Madany (alone or in combination). Therefore, Applicant respectfully submits that the Examiner's basis for rejection of Claims 3 and 8 under 35 U.S.C. § 103(a) is traversed, as these claims are dependent on allowable base claims and contain additional limitations that are patentably distinguishable over the combination of Narasimhan, Breslau and Madany.

## CONCLUSION

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected Claims.


Based on the arguments presented above, Applicant respectfully asserts that Claims 1-12 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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